

RICHARD H. ROSENBERG
ATTORNEY AT LAW

217 BROADWAY
SUITE 707
NEW YORK, NEW YORK 10007

TEL: 212-586-3838
FAX: 212-962-5037
richrosenberg@msn.com

February 7, 2023

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application granted. The status conference is adjourned to April 6, 2023 at 11:00 a.m. Time is excluded until April 6, 2023, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.

Re: United States v. Ortega, et al.
S3-22-CR-091 (RA)



Ronnie Abrams, U.S.D.J.
February 7, 2023

Dear Judge Abrams:

On behalf of Josefina Marine, a defendant in the above-captioned case, I respectfully write with the Government's consent to request a 45-day adjournment of the status conference currently scheduled for Friday, February 10, 2023, at 12:00 pm.

As the Court may be aware, Ms. Marine is the mother of Billy Ortega, whose case was recently tried before your Honor. Following the verdict in that case, the parties have been in contact about a potential resolution of Ms. Marine's case. Discussions are in the early stages, as Ms. Marine needs time to review (with counsel) the discovery produced in connection with Mr. Ortega's trial as well as the testimony at trial, and to consider how she wishes to proceed. There are no discovery-related matters that require the Court's intervention at this time.

To allow sufficient time for meetings with Ms. Marine and discussions with the Government in furtherance of plea negotiations, we ask the Court to adjourn the scheduled status conference to a date in late March or early April 2023, at the Court's convenience. If the Court grants this request, the Defense consents to the exclusion of Speedy Trial time from February 10,

2023, until the date set by the Court for purposes of ongoing discovery review and discussions about a pretrial resolution of Ms. Marine's case.

Thank you for your consideration of this request and for continued courtesies to counsel.

Respectfully,

/s/

Richard H. Rosenberg, Esq.

Cc: All counsel (by ECF)